

EXHIBIT F

To Whom It May Concern:

I submit this affidavit to supplement a previous affidavit I signed on July 11, 2014.

I would like to reiterate that I enthusiastically support Dr. Irani's application for medical licensure with the California Medical Board and based on my experience as his attending physician I have no concerns about whether Dr. Irani can practice safely.

I was looking forward to testifying on Dr. Irani's behalf, both about his admirable character and capabilities as an orthopaedic resident during my time as his supervising attending at Palmetto Health Richland. Additionally, I was looking forward to testifying in person to help illustrate for the California Medical Board the very important dynamics I observed between Dr. Irani and some of his superiors while he was a resident at the Palmetto Health residency program. Unfortunately, due to my on-call duties and responsibilities, I am unable to travel to California to testify at the hearing in person. However, I am available to testify by phone or video conference during the afternoon of September 30, 2014, and would be eager share my observations and open myself up to cross-examination by the Board regarding my opinions. I have no doubt that I would be able to accurately convey my testimony via telephone or video conference.

I hope the Board can appreciate how difficult it would be for most health care practitioners to take two days off to attend an out-of-state trial. This poses a burden not just for the individual who would like to offer testimony, but the medical practice and patients he or she serves. It is clear that my testimony would mean a lot to Dr. Irani during this case, and I sincerely wish my schedule could be more accommodating. Unfortunately, like most of my colleagues, I am similarly burdened by the constraints of my practice, the patients I serve, and the call schedule which precludes me from traveling to California on the scheduled dates of September 29-30, 2014.

Given these limitations, I am eager to assist Dr. Irani and I believe it is important for the California Medical Board to be aware of some additional relevant facts which I observed that I had not discussed in my previous affidavit regarding my observations of Dr. Irani while he worked at Palmetto Health.

I am aware of Dr. Irani's termination from the Palmetto Health program. During his time there, I was in a position to have the opportunity to observe Dr. Irani's interaction with his superiors. A particularly disturbing incident stands out in my

mind that occurred during one of the Journal Club meetings. Journal club is gathering every month where all the residents and all the faculty are together in the same room. This serves as the largest gathering for our residency program; if there is public knowledge, information, or a public display, this is the best venue to share that information given the attendance. I remember Dr. Irani was a young orthopaedic surgeon who had just finished his intern year (around June/July 2011). Dr. Irani was asked to read and present an article about "sharks" and what sharks do when "sharks" smell blood. Additionally the article discussed how to not upset the sharks, and when you are wounded sharks like to attack. Journal Club is supposed to be a time to share academic articles about medicine; this was a clear deviation from the usual articles that are presented in Journal Club. To add insult to injury, not only was Dr. Irani asked to present, comment, and summarize this article, but he was then informed by Dr. Koon (in front of everyone) that this was not randomly assigned to him. This public comment struck an ominous tone, and clearly was meant to humiliate Dr. Irani in front of his peers. I witnessed this unsavory interaction by Dr. Koon and I could tell that this sophomoric exercise assigned to Dr. Irani by Dr. Koon and the comments made by Dr. Koon were obviously humiliating and embarrassing for Dr. Irani.

I am also aware of another interaction that took place between Dr. Koon and Dr. Irani that is unsettling. My understanding is that Dr. Irani had attempted to suggest an article for Journal Club that he believed to be relevant to our practice from the Annals of Internal Medicine, but was met with a curt and condescending rejection by Dr. Koon. It is unclear why an article about "Sharks" that was meant to humiliate Dr. Irani in a large public venue was deemed appropriate for an educational setting, but an article from a respected medical journal was the cause of much derision and ridicule on the part of Dr. Koon. If anything Dr. Irani should be commended for taking a serious proactive interest in his education and training by offering an important hot topic issue affecting many patients today.

For his part, I believe that Dr. Irani took these inappropriate and for a lack of a better word, "hazing" incidents in stride. I never heard Dr. Irani complain about his mistreatment. It was clear that Dr. Irani was accustomed to such behavior and tried his best to brush it off by smiling congenially when confronted with these comments by Dr. Koon. However, such comments clearly made him feel uncomfortable as it did me.

Having worked with Dr. Irani I find him a strong, competent young physician, who unfortunately was clearly singled out during his time at Palmetto Health.

I am happy to make myself available to the court on the afternoon of September 30th to testify by phone or video conference. If this is not possible, I urge the Board to



read my affidavits and take this information into consideration when making a decision to grant Dr. Irani's license.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct:

9/22/14 John M. Iaquinto
(Date) (Signature)

John M. Iaquinto MD

State of Florida County of Bays

Subscribed and sworn to (or affirmed) before me on this 22nd day of Sept., 2014, by John Iaquinto, personally known to me or proved to me on the basis of satisfactory evidence to be the person who appeared before me

Melissa Anderson

Signature of Notary Public



Melissa Anderson
NOTARY PUBLIC
STATE OF FLORIDA
Comm# FF144001
Expires 7/26/2018

Notary Public for State of Florida

My commission expires: 7/26/18